

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI,
MARY BLY, MICHAEL CONNELLY,
SYLVIA DAY, JONATHAN FRANZEN,
JOHN GRISHAM, ELIN HILDERBRAND,
CHRISTINA BAKER KLINE, MAYA
SHANBHAG LANG, VICTOR LAVALLE,
GEORGE R.R. MARTIN, JODI PICOULT,
DOUGLAS PRESTON, ROXANA
ROBINSON, GEORGE SAUNDERS, SCOTT
TUROW, and RACHEL VAIL, individually
and on behalf of others similarly situated,

Plaintiffs,

v.

OPENAI INC., OPENAI LP, OPENAI LLC,
OPENAI GP LLC, OPENAI OPKO LLC,
OPENAI GLOBAL LLC, OAI
CORPORATION LLC, OPENAI HOLDINGS
LLC, OPENAI STARTUP FUND I LP,
OPENAI STARTUP FUND GP I LLC, and
OPENAI STARTUP FUND MANAGEMENT
LLC,

Defendants.

Case No. 23-cv-08292-SHS-OTW

**[PROPOSED] ORDER GRANTING
MOTION TO ADMIT COUNSEL
PRO HAC VICE**

The motion of Andrew M. Gass for admission to practice *pro hac vice* in the above-captioned matter is granted.

Applicant has declared that he is a member in good standing of the bar of the State of California; and that his contact information is as follows:

Applicant's Name: Andrew M. Gass

Firm Name: Latham & Watkins LLP

Address: 505 Montgomery Street, Suite 2000

City/State/Zip: San Francisco, CA 94111

Telephone: (415) 391-0600

Fax: (415) 395-8095

Applicant having requested admission *pro hac vice* to appear for all purposes as counsel for Defendants OpenAI, Inc., OpenAI L.P., OpenAI GP, L.L.C., OpenAI, L.L.C., OpenAI OpCo, LLC, OpenAI Global, LLC, OAI Corporation LLC, OpenAI Holdings, LLC, OpenAI Startup Fund I, L.P., OpenAI Startup Fund GP I, L.L.C., and OpenAI Startup Fund Management, LLC (together, “OpenAI”), in the above-entitled action;

IT IS HEREBY ORDERED that Applicant is admitted to practice *pro hac vice* in the above-captioned matter in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys.

Dated: _____, 2023

United States District Judge Sidney H. Stein